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7 Attorney for Eddie Junior Rodriguez

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 EDDIE JUNIOR RODRIGUEZ,

15 Defendant.

16 Case No. 2:15-CR-00020-KJD-VCF

17  
18 **UNOPPOSED MOTION TO**  
**CONDUCT PRE-PLEA**  
**PRESENTENCE INVESTIGATION**  
**REPORT AND PROPOSED ORDER**

19  
20 Eddie Junior Rodriguez, the Defendant in this case, through his attorney, Rene L.  
Valladares, Federal Public Defender, and Assistant Federal Public Defender, William Carrico,  
file this Motion to the Court to Order that a Presentence Investigation Report be conducted  
before a finding of guilt is made. This unopposed motion is made for the following reasons.

21 DATED this 6<sup>th</sup> day of October, 2015.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/ William Carrico

25 WILLIAM CARRICO,  
26 Assistant Federal Public Defender  
Attorney for Eddie Rodriguez

1                   **UNOPPOSED MOTION FOR PREPARATION OF PRE-PLEA PSI**

2                   Eddy Rodriguez was charged by Complaint on December 30, 2014, with four counts of  
3 Robbery under the Hobbs Act. On January 21, 2015 Mr. Rodriguez was indicted on those same  
4 charges. The Parties agree that the case may be appropriate for disposition short of trial, and  
5 they agree that having a good understanding of this Defendant's Criminal History is important  
6 to a fair disposition of the case. Trial in this matter is set for January 25, 2015.

7                   Despite the best efforts of the Parties, the information available from agency summaries  
8 and computer data bases regarding the Defendant's complete Criminal History remains  
9 confusing and contradictory. A mistaken calculation could expose the Defendant to enhanced  
10 punishment. If not properly counseled, this could result in a plea that is uninformed as to the  
11 full consequences. Counsel for the Parties have informally inquired of the Office of U.S.  
12 Probation as to whether resources are available for the requested purpose and have been assured  
13 that such a request from the Court would not compromise efficiency or divert needed resources.  
14 For these reasons, the parties respectfully request that a pre-plea Presentence Investigation  
15 Report be conducted in this matter.

16                   Dated this 6<sup>th</sup> day of October, 2015.

17                   Respectfully submitted,

18                   RENE L. VALLADARES  
Federal Public Defender

19                   By: /s/ William Carrico

20                   WILLIAM CARRICO  
Assistant Federal Public Defender  
21 Attorney for Eddie Junior Rodriguez

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
EDDIE JUNIOR RODRIGUEZ,  
Defendant.

Case No. 2:15-CR-00020-KJD-VCF

## **ORDER**

The reasons being sound, the Parties being in agreement and the best interests of justice and judicial economy being served:

IT IS HEREBY ORDERED that the United States Probation Office prepare a Presentence Investigation Report in this case prior to a finding of guilt or entry of plea by the Defendant named above.

DATED: this 22ND day of October 2015.

*Kerry D.*

UNITED STATES DISTRICT JUDGE